

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON**

UNITED STATES OF AMERICA,

6:22-CR-00262-MC

v.

**STIPULATED ORDER FOR AN
INTERLOCUTORY SALE**

**MICHAEL MALEKZADEH and
BETHANY MOCKERMAN,**

Defendants.

Plaintiff, United States of America; and defendants Michael Malekzadeh and Bethany Mockerman, through their attorneys, hereby stipulate to this Order for an interlocutory sale of the following seized items in this case:

1. MB&F M.A.D. Edition "It's a M.A.D. World" Watch,
2. Gentlemens Audemars Piguet Royal Oak Openworked Double Balance,
3. Ladies Audemars Piguet Royal Oak,
4. Gentlemens Audemars Piguet Royal Oak Openworked Double Balance,
5. Gentlemens Girard Perregaux watch Lauretto Tourbillon,
6. Gentlemens Girard Perregaux watch Minute Repeater Tri-Axial Tourbillon Earth to Sky,
7. Gentlemens Girard Perregaux Watch Cosmos Infinity,
8. Gentlemens Purnell Watch, Escape 2,
9. Gentlemens Purnell Watch, Escape 2, and
10. Gentlemens Audemars Piguet watch, Royal Oak.

This agreement has no effect on the claims or defenses of any party.

The Government and defendants Michael Malekzadeh and Bethany Mockerman agree that it is in the best interest of all the parties for these watches to be sold and the parties agree that the U.S. Marshals Service shall sell the items according to the ordinary course and procedures they typically use for selling luxury goods. The proceeds of the sale shall be distributed in the following order:

1. The United States Marshals Service shall be compensated for all costs, including shipping, storing, and auctioning/selling the items.
2. The remainder shall be deposited in the Assets Forfeiture Fund and substituted in all respects for the items listed above, as the substitute *res*.

SO STIPULATED:

s/ Michelle Kerin
MICHELLE KERIN
Attorney for Defendant Michael Malekzadeh

DATE: February 4, 2023

s/ Bridget Donegan
BRIDGET DONEGAN
Attorney for Defendant Bethany Mockerman

DATE: February 10, 2023

s/ Katherine C. De Villiers
KATHERINE C. DE VILLIERS
Assistant United States Attorney
Attorney for Plaintiff United States of America

DATE: February 14, 2023

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Having reviewed the foregoing Stipulation and good cause appearing,

IT IS SO ORDERED February 16th, 2023.

s/Michael J. McShane

HONORABLE MICHAEL McSHANE
United States District Judge